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Attorneys for Plaintiff
American Management Association International

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AMERICAN MANAGEMENT	:
ASSOCIATION INTERNATIONAL,	:
	:
Plaintiff,	:
	:
vs.	:
	:
STUART SYME, GERSHENSON	:
AND ASSOCIATES, INC., and	:
STEPHEN GERSHENSON,	:
Individually and in his capacity	:
as President of GERSHENSON	:
AND ASSOCIATES, INC.,	:
	:
Defendants.	:
	:
-----X	

Civil Action No. 08 Civ. 6998
(SHS) (FM)

**NOTICE OF MOTION FOR
PRELIMINARY INJUNCTION
AND
EXPEDITED DISCOVERY**

PLEASE TAKE NOTICE that, upon the Summons and Verified Complaint and exhibits annexed thereto, the Notice of Motion for Preliminary Injunction and Expedited Discovery, the Affidavit of Patricia Leonard, sworn to August 1, 2008, and Plaintiff American Management Association International's ("AMA") Memorandum of Law in Support of Motion for Preliminary Injunction and Expedited Discovery, Plaintiff AMA, by and through is undersigned counsel Kasowitz, Benson, Torres & Friedman, LLP, will move the Court, at the United States Courthouse for the Southern District of New York,

500 Pearl Street, New York, New York, on a date first available for the Court for an Order: (a) granting a preliminary injunction pursuant to Fed. R. Civ. P. 65 against Defendants Stuart Syme, Gershenson and Associates, Inc., and Stephen Gerhsenson, and all those acting in concert with any of them, on the terms set forth in the attached Proposed Order Granting Preliminary Injunction; (b) pursuant to Federal Rules of Civil Procedure 26, 30, and 34 and 28 U.S.C. § 1657(a), granting expedited discovery on the terms set forth in the attached Proposed Order Granting Expedited Discovery; and (c) for such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, in the event an opposition is filed to the instant motion, Plaintiff respectfully requests oral argument.

Dated: New York, New York
August 13, 2008

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